

*Kevin H. Sharp*

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**BRIDGESTONE AMERICAS, INC.,**

**Plaintiff,**

**vs.**

**INTERNATIONAL BUSINESS  
MACHINES CORPORATION,**

**Defendant.**

**Civil Docket No. 3:13-CV-1196**

**JURY DEMANDED**

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**INTERNATIONAL BUSINESS  
MACHINES CORPORATION,**

**Counterclaim Plaintiff,**

**Judge Sharp  
Magistrate Judge Brown**

**vs.**

**BRIDGESTONE AMERICAS, INC. and  
BRIDGESTONE CORPORATION,**

**Counterclaim Defendants.**

**IBM'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Defendant International Business Machines Corporation ("IBM") moves this Court for leave to file its Reply in Support of its Motion to Dismiss Bridgestone's Claims, as well as exhibits 1 - 6 thereto under seal pursuant to Federal Rule of Civil Procedure 5.2(d) and Administrative Order No. 167, Section 5.07. In support of this motion, IBM states as follows:

1. IBM's Reply in Support of its Motion to Dismiss Bridgestone's Claims, as well as exhibits 1 - 6 thereto contain information from documents and excerpts from deposition transcripts designated as confidential by Plaintiff/Counterclaim Defendant Bridgestone Americas, Inc. under the Amended Protected Order. *See* Dkt. 141.